UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In re GENWORTH FINANCIAL, INC. SECURITIES LITIGATION	Master File No. 1:14-cv-02392-AKH
	CLASS ACTION
This Document Relates To: ALL ACTIONS.	LEAD PLAINTIFFS' NOTICE OF MOTION AND MOTION FOR CLASS CERTIFICATION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs City of Hialeah Employees' Retirement System and New Bedford Contributory Retirement System will and hereby do move this Court, on a date and at such time as may be designated by the Court, at 500 Pearl Street, New York, New York 10007, for an order: (1) certifying this case as a class action; (2) certifying Lead Plaintiffs City of Hialeah Employees' Retirement System and New Bedford Contributory Retirement System as Class Representatives; and (3) appointing Robbins Geller Rudman & Dowd LLP and Labaton Sucharow LLP as Class Counsel. In support of this Motion, Lead Plaintiffs submit the accompanying Memorandum of Law, the Declaration of Steven P. Feinstein, Ph.D., CFA (and exhibits thereto), the Declaration of Douglas R. Britton (and exhibits thereto), and a [Proposed] Order.

DATED: January 29, 2016

Respectfully submitted,

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- Notice of Motion and Motion for Class Certification
- Lead Plaintiffs' Memorandum of Law in Support of Motion for Class Certification
- Declaration of Douglas R. Britton in Support of Lead Plaintiffs' Motion for Class Certification

Exhibits to the Declaration of Douglas R. Britton

Exhibit 1: Defendants' Responses and Objections to Plaintiffs' First Set of Requests for Admission, dated November 20, 2015;

Exhibit 2: Excerpts from deposition transcript of Robert W. Williams II, dated December 17, 2015;

Exhibit 3: Excerpts from deposition transcript of Gerard H. Arnaudet, dated December 11, 2015;

Exhibit 4: Verification of Lead Plaintiff City of Hialeah Employees' Retirement System, dated November 23, 2015;

Exhibit 5: Verification of Lead Plaintiff New Bedford Contributory Retirement System, dated November 20, 2015;

Exhibit 6: Firm Résumé of Robbins Geller Rudman & Dowd LLP; and

Exhibit 7: Firm Résumé of Labaton Sucharow LLP.

- Declaration of Steven P. Feinstein, Ph.D., CFA in Support of Plaintiffs' Motion for Class Certification

Exhibits to the Declaration of Steven P. Feinstein, Ph.D., CFA

Exhibit 1: Documents and Other Information Reviewed and Relied Upon;

Exhibit 2: Curriculum Vitae, Steven P. Feinstein, Ph.D., CFA;

Exhibit 3: Steven P. Feinstein, Ph.D., CFA, Testimony in the Last Four Years;

Exhibit 4: Genworth Stock Prices, Volume, and Returns, April 14, 2011 through April 18, 2012;

Exhibit 5: Market Index and Peer Index Returns, April 14, 2011 through April 18, 2012;

Exhibit 6: Genworth Common Stock Regression Results, April 15, 2011 through April 17, 2012; and

Exhibit 7: Genworth Common Stock Event Study Results.

CERTIFICATE OF SERVICE

I hereby certify that on January 29, 2016, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the attached Electronic Mail Notice List, and I hereby certify that I caused to be mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the attached Manual Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on January 29, 2016.

s/ DOUGLAS R. BRITTON

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Manual Notice List

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- (No manual recipients)